



ATTORNEYS AT LAW

March 7, 2025

VIA CM/ECF

Hon. Jennifer H. Rearden
United States District Court
Southern District of New York
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New York, New York 10007

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Re: *Sound Around, Inc. v. Friedman et al.*
Case No. 1:24-cv-01986

Dear Judge Rearden:

This firm represents Defendants Moises Friedman, Shulim Eliezer Ilowitz, ML Imports, Inc., CYRF, Inc., LRI Group, LLC, MDF Marketing Inc., and World Group Import, LLC (“Defendants”) in the above-referenced matter. This joint letter is submitted after conferring with counsel for Plaintiff Sound Around, Inc., as required by Your Honor in the January 15, 2025 Text Order. (*See* ECF Doc. No. 125).

Together, we respectfully submit proposed deadlines for pre-hearing submissions and additional briefing for the preliminary injunction scheduled for May 13, 2025. The parties propose the following deadlines:

- April 25, 2025: All parties exchange and provide the Court with affidavits constituting direct testimony, deposition excerpts to be introduced as direct evidence and a synopsis thereof, and documentary exhibits to be used at the hearing;
- May 1, 2025: All parties exchange and provide the Court with the list of affiants they wish to cross-examine at the hearing;
- May 7, 2025: All parties exchange and provide the Court with pre-hearing briefs, which shall not exceed 25 pages.

Thank you for your consideration.

Sincerely,

/s/Megan J. Muoio

Megan J. Muoio

cc: All counsel (via ECF)